

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED)	
RESOURCE PLANNING FOR THE)	
PROVISION OF STANDARD OFFER)	PSC DOCKET NO. 14-0559
SERVICE BY DELMARVA POWER &)	
LIGHT COMPANY UNDER DEL. C.)	
§1007(C) & (D))	

**PETITION OF THE DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL FOR LEAVE TO INTERVENE**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission (26 DEL. ADMIN. CODE § 1001-2.9), the State of Delaware Department of Natural Resources and Environmental Control (“DNREC”) hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, DNREC states the following:

1. On December 2, 2014, Delmarva Power & Light Company filed with the Commission its proposed Integrated Resource Plan (“IRP”), Docket 14-0559. The Commission set February 23, 2015, as the deadline for filing petitions to intervene.

2. DNREC is an agency of the State of Delaware, created pursuant to 29 *Del. C.* § 8001, *et seq.* DNREC’s mission “is to ensure the wise management, conservation, and enhancement of the State’s natural resources, protect public health and the environment, provide quality outdoor recreation, improve the quality of life and educate the public on historic, cultural, and natural resource use, requirements and issues.”

3. DNREC’s contact information, pursuant to Rule 21(i) (26 DEL. ADMIN. CODE § 1001-2.9.1.1) of the Commission’s Rules of Practice and Procedure, is as follows:

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4. Delmarva Power & Light Company seeks approval of its 2015 IRP. The docket involves policy issues of interest to DNREC Division of Energy & Climate. The IRP includes discussion and analysis of renewable energy, energy efficiency, environmental impacts, and externality benefits – topics involving DNREC’s statutory responsibilities. Additionally, the Public Service Commission requires consultation from DNREC in Title 26, Chapter 3010, Section 9.2 of the Delaware Administrative Code: “The Commission shall seek input from DNREC on the issue of externalities and environmental benefits due to emissions, as the result of the proposed IRP.” 29 DEL. ADMIN. CODE § 3010-9.2.

5. DNREC’s interest will not be adequately represented by any of the other parties to this proceeding. DNREC Division of Energy & Climate has statutory responsibility for the management and development of energy efficiency and renewable energy in Delaware. In that respect, no other participant in this proceeding has the same obligation to promote the development of clean energy resources in Delaware.

6. DNREC's participation in the proceeding will be in the public interest. The public relies upon DNREC Division of Energy & Climate to provide guidance and expertise in understanding the environmental risks and benefits of Delaware's energy supply. DNREC has intervened in similar dockets, PSC Docket No. 10-2 and PSC Docket No. 12-544, Delmarva Power & Light Company's previous IRP proposals.

7. For the foregoing reasons, DNREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

/s/ William J. Kassab

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Attorney for the Department of Natural
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Dated: February 18, 2015

CERTIFICATE OF SERVICE

I certify that on February 18, 2015, I filed the attached *Petition for Leave to Intervene of the Department of Natural Resources and Environmental Control* with the Public Service Commission.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ William J. Kassab

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